

## RISK BUDGETING POLICY

The Nebraska Investment Council recognizes that by utilizing active investment managers, additional levels of risk are incurred in the attempt to achieve greater than market returns. This risk is commonly referred to as “active risk” or “benchmark risk,” and represents the probability and magnitude that the investment returns earned will differ from those of the corresponding market indices. Recognizing that active risk is necessary to earn above market returns, but also may result in below benchmark returns, the Council has established active risk ranges for the major asset classes and the total fund. Thus, while above market returns are sought, the level of risk being taken, relative to the benchmarks, is managed. Specifically, the approved active risk ranges, which represent the standard deviation of the asset class/total fund’s return relative to the return of its benchmark, are as follows:

|                       |                |
|-----------------------|----------------|
| Domestic Equity:      | 1.00% -- 2.00% |
| International Equity: | 2.00% -- 3.00% |
| Global Equity:        | 3.00% -- 4.00% |
| Fixed Income:         | 0.50% -- 1.00% |
| Total Fund:           | 0.75% -- 1.50% |

Active risk can stem from two sources: manager-specific risk and “misfit” risk. Misfit risk represents the inherent mismatch between an asset class benchmark and the composite of individual portfolio benchmarks. For example, if the domestic equity asset class benchmark is the DJ Wilshire 5000 Index, the weighted average of the benchmarks for all managers within the domestic equity asset class should have the same investment exposures (large-cap/small-cap and growth/value) as the Wilshire 5000. Otherwise, misfit risk occurs, and this risk is uncompensated risk over long periods of time. Accordingly, the allocations within the major asset classes will be determined to minimize misfit risk and optimally result in substantially all of the fund’s active risk being derived from manager-specific risk.

The above active risk ranges must be accommodated when replacing existing managers or pursuing new active investment strategies. As the Council reviews new investment managers or strategies for consideration, a detailed analysis of prospective active risk will be provided by the Council’s investment consultant to ensure the Council’s selections will be consistent with this Policy.

By the end of each first calendar quarter, the State Investment Officer will review the actual active risk incurred within the portfolios of all active managers, of the major asset classes, and of the fund in total during the preceding three-year period. Active risk outside of the above ranges will be reported to the Council at their next meeting. In consultation with the Council’s investment consultant, a recommendation regarding any deviation will also be made to the Council at this time.

This policy will be reviewed by the Council at least every three years to ensure relevance and levels of risk-taking are currently appropriate.

Revised April 20, 2006